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4	paleeming@sbcglobal.net	
5	Attorneys for defendant	
6	DAVID CAMPOY	
7		
8		
9	IN THE UNITED ST	TATES DISTRICT COURT
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
11		OSE DIVISION
12		
13	UNITED STATES OF AMERICA,) No. CR 20-0458 BLF
14	Plaintiff,) STIPULATION AND [PROPOSED]) ORDER CONTINUING STATUS
15	vs.	CONFERENCE DATE FROM
16	DAVID CAMPOY, et al	DECEMBER 7, 2021 TO FEBRUARY 22, 2022
17))
18	Defendants.)
19)
20		
22	1. This matter is set for a sta	atus hearing on December 7 at 9:00 AM. The
23	23-count Second Superseding Indictment charges fifteen defendants with a variety of drug trafficking and firearms offenses. The case involves a substantial volume of	
24		
25	discovery, including multiple wiretaps.	
	I and the second	

Stipulation and $\frac{Proposed}{Proposed}$ Order 20 CR-0458- 1

1	2. The government has been p	roducing discovery on a rolling basis. A	
2	substantial production was made to the jo	int discovery coordinator and that material	
3	was made available to defense counsel on September 21. The government has		
4	recently provided pole camera surveillance footage, consisting of approximately fou		
5	terabytes of data to the group discovery coordinator. That material is in the process		
6	of being distributed to defense counsel. A continuance will allow the parties time to		
7	review the substantial volume of discovery.		
8	3. The parties stipulate that the ends of justice served by granting the		
9	requested continuance outweigh the best interest of the public and the defendants in		
10	speedy trial, given the need for effective preparation of counsel.		
11	For the above reasons, the parties respectfully request that the date of		
12	December 7, 2021 be vacated, and that the matter be re-set for a status conference or		
13	February 22, 2022.		
14	IT IS SO STIPULATED.		
15	DATED:	/s/	
16		ALEXANDRA SHEPARD Assistant United States Attorney	
17		•	
18	DATED	/s/	
19		Peter A. Leeming Attorneys for David Campoy	
20	DATED:	/s/	
21		EDWARD AJLOUNY Counsel for Defendant Jose Campoy	
22			
23	DATED:	DOUGLAS RAPPAPORT	
24		Counsel for Defendant David Greenman	
25			

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1	DATED:	SEVERA KEITH
2		Counsel for Defendant Kimberly Carrasco
3	DATED:	/s/
4	DATED.	DAVID PLOTSKY
5		Counsel for Defendant Miguel Carrizal Zamora
6	DATED:	RICHARD WEESE,
7		RICHARD WEESE, Counsel for Defendant Jose Rodriguez Naranjo
9		Tracaingo
10	DATED:	/s/ NAOMI CHUNG
		NAOMI CHUNG Counsel for Defendant Nicholas Ardanuy
11		
12	DATED:	/s/
13		JERRY FONG Counsel for Defendant Ignacio Espinoza
14		Counsel for Bereinaum Ignatio Espinoza
15	DATED:	/ _S / ROBERT CAREY
16		ROBERT CAREY Counsel for Defendant Juan Johel Padilla
17		Counsel for Defendant Juan Joher Ladina
18	DATED:	/s/
19		ALFREDO MORALES Counsel for Defendant Luis Sendino
20		Counsel for Defendant Luis Sendino
21	DATED:	/s/
22		ROBERT LYONS Council for Defendent Michael Ocupe
		Counsel for Defendant Michael Osuna Guizar
23		
24		
25		

1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE NORTHERN DISTRICT OF CALIFORNIA 3 SAN JOSE DIVISION 4 5 No. 20 CR-0458 BLF UNITED STATES OF AMERICA, 6 [PROPOSED] ORDER Plaintiff, **CONTINUING STATUS** 7 **CONFERENCE DATE** VS. 8 DAVID CAMPOY, et al, 9 10 Defendants. 11 12 13 GOOD CAUSE APPEARING, it is hereby Ordered that the status conference 14 set for Monday, December 7, 2021in the above matter is continued to February 22, 15 2022, at 9:00 A. M. for status. 16 The time between December 7, 2021 and February 22, 2022 is excluded from 17 the Speedy Trial Act due to the need for defense investigation and effective 18 preparation of counsel. Furthermore, the Court finds that the ends of justice served 19 by granting the requested continuance outweigh the best interest of the public and the 20 defendant in a speedy trial. The Court therefore concludes that this exclusion of time 21 should be made under 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv). 22 It is so Ordered. 23 Dated: December 3, 2021 24 The Hon. Beth Labson Free United States District Court Judge 25